

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:

SOLAR BIOTECH, INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11402 (LSS)

Jointly Administered

**Objection. Deadline:**  
**September 11, 2025 at 4:00PM (ET)**

**ELEVENTH MONTHLY APPLICATION OF BRINKMAN LAW GROUP, PC FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO THE COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD FROM JUNE 1, 2025, THROUGH JUNE 30, 2025**

**Name of Applicant:**

Brinkman Law Group, PC

**Authorized to Provide  
Professional Services to:**

Committee of Unsecured Creditors

**Date of Retention:**

July 9, 2024

**Period for which compensation  
and reimbursement is sought:**

June 1, 2025 – June 30, 2025

**Amount of Compensation sought  
as actual, reasonable, and  
necessary legal services  
rendered:**

\$34,050.00

**Amount of expense  
reimbursement sought as actual,  
reasonable, and necessary:**

\$0.00

This is a(n): X monthly \_ interim \_ final application.

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<sup>1</sup> The Debtors in these Chapter 11 Cases are Solar Biotech, Inc. and NobleGen, Inc. The location of Debtor's principal place of business is 5516 Industrial Park Rd, Norton, VA 24273, Attn: Alex Berlin.

Prior applications:

| Date Filed | Period Covered    | Requested    |            | Approved     |            |
|------------|-------------------|--------------|------------|--------------|------------|
|            |                   | Fees         | Expenses   | Fees         | Expenses   |
| 11/04/2024 | 07/08/24-08/30/24 | \$319,308.00 | \$1,847.70 | \$255,446.40 | \$1,847.70 |
| 11/18/2024 | 09/01/24-09/30/24 | \$172,657.40 | \$1,040.40 | \$141,892.40 | \$2,225.37 |
| 12/31/2024 | 07/08/24-09/30/24 | \$496,673.50 | 4,073.07   | TBD          | TBD        |
| 01/08/2025 | 10/01/24-10/31/24 | \$113,221.00 | \$1,170.90 | \$90,576.80  | \$1,170.90 |
| 01/29/2025 | 11/01/24-11/30/24 | \$58,571.50  | \$1,589.12 | \$46,827.20  | \$1,589.12 |
| 02/18/2025 | 12/01/24-12/31/24 | \$63,067.00  | \$927.10   | \$50,453.60  | \$927.10   |
| 03/10/2025 | 01/01/25-01/31/25 | \$83,087.00  | \$800.90   | \$66,469.60  | \$800.90   |
| 04/30/2025 | 02/01/25-02/28/25 | \$33,075.50  | \$0        | \$26,460.40  | \$0        |
| 06/05/2025 | 03/01/25-03/31/25 | \$18,064.00  | \$0        | \$14,451.20  | \$0        |
| 07/25/2025 | 04/01/25-04/30/25 | \$53,211.50  | \$926.60   | \$42,569.20  | \$926.60   |
| 08/20/2025 | 05/01/25-05/31/25 | \$24,405.50  | \$0        | TBD          | TBD        |

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COMES NOW, the Brinkman Law Group, PC (“BLG”) to hereby submit its eleventh consolidated monthly application (“Application”) for compensation for services rendered and reimbursement of expenses as counsel to the Committee of Unsecured Creditors (“Committee”) for the period from June 1, 2025 through June 30, 2025 (“Application Period”) pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq., as amended (“Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (“LBR”), the United State Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30, 1996 (“UST Guidelines”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained*

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<sup>1</sup> The Debtors in these Chapter 11 Cases are Solar Biotech, Inc. and NobleGen, Inc. The location of Debtor’s principal place of business is 5516 Industrial Park Rd, Norton, VA 24273, Attn: Alex Berlin.

*Professionals and (II) Granting Related Relief (“Interim Compensation Order”)* [Doc. 149]. Through this Application, BLG seeks compensation in the amount of \$34,050.00 for services rendered during the Application Period. No prior request for the relief sought in this Application has been made to this or any other court.

In support of this Application, BLG has attached the following:

- **Exhibit A:** a full and detailed invoice describing the services rendered by project category, date, and professional; and
- **Exhibit B:** a summary of hours billed by professional, a summary of hours billed by project category, and a summary of expenses.

#### **JURISDICTION & VENUE**

This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (B). Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory Predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and LBR 2016-2.

#### **BACKGROUND**

On June 23, 2024, each of the Debtors filed a *Voluntary Petition for Non-Individuals Filing for Bankruptcy* [D.I. 1].

On July 8, 2024, the United States Trustee appointed the Committee of Unsecured Creditors pursuant to Section 1102(a)(1) of the Bankruptcy Code [D.I. 76].

On August 8, 2024, the Committee filed its *Application for an Order Authorizing the Retention and Employment of Brinkman Law Group, PC as Counsel to the Official Committee of*

*Unsecured Creditors of Solar Biotech, et al. Effective as of July 9, 2024* [D.I. 143], which was granted on August 12, 2024 [D.I. 149].

On July 16, 2024, the Debtors filed the Debtor's Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [D.I. 88], which was approved by the Court on August 12, 2024 [D.I. 149], setting guidelines for these Chapter 11 cases.

### **RELIEF REQUESTED**

Pursuant to the Interim Compensation Order and Bankruptcy Code Section 331, BLG seeks compensation in the amount of \$27,240.00 (80% of \$34,050.00) in fees for professional services rendered by BLG during the Application Period.

In accordance with the factors enumerated in Bankruptcy Code Section 330, BLG contends that the amount requested is fair and reasonable given (i) the complexity of these cases (ii) the time expended, (iii) the nature and extent of the services rendered, (iv) the value of such services and (v) the costs of comparable services other than in a case under this title. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Application Period. BLG reserves the right to make further application to this Court for Allowance of such fees and expenses not included herein in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

Dated: August 28, 2025.

/s/ Daren Brinkman  
**BRINKMAN LAW GROUP, PC**  
Daren R. Brinkman (CA Bar No. 158698)  
543 Country Club Drive, Suite B  
Wood Ranch, California 93065

Jory D. Cook (NY Bar No. 5251269)  
515 Madison Ave.  
9<sup>th</sup> Fl. New York, NY 10022  
Tel. (818) 597-2992  
Fax (818) 597-2998  
Email: firm@brinkmanlaw.com

*Counsel for the Official Committee of Unsecured  
Creditors*